

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

**Related Docket Nos. 5264 and 5315**

**CERTIFICATION OF COUNSEL REGARDING THE  
EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS  
PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

I, Gregory A. Taylor, hereby certify the following:

1. I am an attorney with Ashby & Geddes, P.A., Delaware Counsel to Walker, Truesdell & Associates, in its capacity as Plan Administrator (the “Plan Administrator”), with respect to the above-captioned case.

2. On November 4, 2004, the Plan Administrator filed and served the Eighteenth Omnibus Objection (Non-Substantive) to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 [Docket No. 5264] (the “Eighteenth Omnibus Objection”). Schedules of the claims subject to objection via the Eighteenth Omnibus Objection were attached to the Eighteenth Omnibus Objection as Exhibits A and B (the “Eighteenth Omnibus Objection Exhibits”).

3. On December 7, 2004, the Court convened a hearing and subsequently entered an Order approving the Eighteenth Omnibus Objection [Docket No. 5315] (the “Eighteenth

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<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.’s United States debtor subsidiaries.

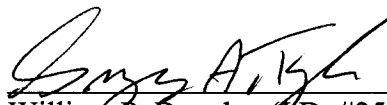
Omnibus Order”). Following entry of the Eighteenth Omnibus Order, the Plan Administrator discovered that the Eighteenth Omnibus Order incorrectly references the Exhibits attached thereto.

4. Specifically, the Eighteenth Omnibus Objection Proposed Order refers to the claims identified on Exhibit A attached to the Order as “No Documentation Claims to be Disallowed and Expunged,” when in fact such claims are identified on Exhibit A as “Late Filed Claims to be Disallowed and Expunged,” and, conversely, the Order refers to the claims identified on Exhibit B attached to the Order as “Late Filed Claims to be Disallowed and Expunged,” when in fact such claims are identified on Exhibit B as “No Documentation Claims to be Disallowed and Expunged.”

5. Thus, in order to correct the record, the undersigned counsel to the Plan Administrator hereby submits the form of Amended Order approving the Eighteenth Omnibus Objection attached hereto as Exhibit 1, which correctly references the claims identified on the Eighteenth Omnibus Objection Exhibits. Accordingly, the undersigned respectfully requests entry of the Amended Order attached hereto as Exhibit 1 at the Court’s earliest convenience.

Dated: December 10, 2004

ASHBY & GEDDES, P.A.



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151054.1

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

**Related Docket Nos. 5264 and 5315**

**AMENDED ORDER APPROVING EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

Upon consideration of the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (the “Objection”);<sup>2</sup> by which the Plan Administrator requested the entry of an order disallowing in full and expunging each of the claims listed on Exhibits A and B attached to the Objection; and after hearing and consideration of the Objection and arguments contained therein, and the opposition thereto, if any; and the Court finding that (a) the Court has jurisdiction over this matter pursuant to Article XI of the Plan, 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (c) notice of the Objection was due and proper under the circumstances; and good and sufficient cause appearing therefor, it is hereby

ORDERED, that the Objection is sustained as provided herein; and it is further

ORDERED, that the Late Filed Claims identified as “Late Filed Claims to be Disallowed and Expunged” on Exhibit A attached hereto are disallowed in full and expunged in their

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<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.’s United States debtor subsidiaries.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Objection.

entirety; and it is further

ORDERED, that the No Documentation Claims identified as “No Documentation Claims to be Disallowed and Expunged” on Exhibit B attached hereto are disallowed in full and expunged in their entirety; and it is further

ORDERED, that this Court shall retain jurisdiction with respect to any matters related to or arising from the implementation or interpretation of this Order.

Dated: December \_\_\_\_, 2004  
Wilmington, Delaware

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Honorable John L. Peterson  
United States Bankruptcy Judge

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

BRAC Group, Inc. f/k/a Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Basis for Objection
6108825 COMANS, JAMES C/O WALTZER & ASSOCIATES BRUCE C. WALTZER 3715 WESTBANK EXP. SUITE 13 HARVEY, LA 70058	00005233	02-12152	05/20/2004	\$10,000.00	U	The proof of claim was filed after the Bar Date.
6112997 DOTTERY, LARRY II C/O MARC MENDELSON, ESQ. RITA KOSTOPOULOS, ESQ. 19080 WEST TEN MILE ROAD SOUTHFIELD, MI 48075	00005238	02-12152	05/27/2004	\$150,000.00	U	The proof of claim was filed after the Bar Date.
5312089 MCCOY, GERINA 3160 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/28/2003	\$70,000.00	U	The proof of claim was filed after the Bar Date.

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Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

The Trumbull Group, 4 Griffin Road North, Windsor, CT 06095 860-687-7596 version\_01

BRAC Group, Inc. f/k/a Budget Group, Inc., et al.  
Case No. 02-12152

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Basis for Objection
6160725 MILILANI BACK CARE CENTER, INC. TED CHUN, D.C., CHIROPRACTOR 95-720 LANIKUHANA AVE. MILILANI, HI 96789	00005312	02-12152	06/21/2004	\$305.71	U	The proof of claim was filed after the Bar Date.
5983928 MOORE, MICHELLE & KEITH C/O WILLIAM W. PRICE, P.A., ATTORNEY A NEIL P. ANTHONY 320 FERN STREET WEST PALM BEACH, FL 33401	00005209	02-12152	03/11/2004	\$1,000,000.00	U	The proof of claim was filed after the Bar Date.
<b>TOTALS:</b>	<b>5</b>			<b>\$1,230,305.71</b>		

- END OF LATE EXHIBIT -

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Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**BRAC Group, Inc. f/k/a Budget Group, Inc., et al.**  
**Case No. 02-12152**

**No Documentation Claims to be Disallowed and Expunged**  
**Exhibit B - Eighteenth Omnibus (Non-Substantive) Objection**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Proposed Disallowance
5772546 BELGRAVE, MICHAEL 311 TAFT AVE. CLEVELAND, TX 77327	00005293	02-12152	06/10/2004	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
5312089 MCCOY, GERINA 3160 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/28/2003	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
<b>TOTALS:</b>	<b>2</b>			<b>\$140,000.00</b>		

- END OF NODOC EXHIBIT -

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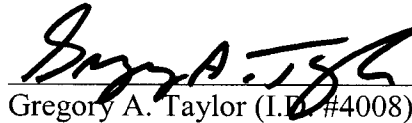
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\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**CERTIFICATE OF SERVICE**

I, Gregory A. Taylor, hereby certify that, on the 10<sup>th</sup> day of December 2004, I caused a true and correct copy of the *Certification of Counsel Regarding the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1* be served upon the attached service list by U.S. Mail, postage pre-paid, or in the manner so indicated:

  
\_\_\_\_\_  
Gregory A. Taylor (I.D. #4008)

In re BRAC Group, Inc.; Case No. 02-12152 (CGC)  
Post-Effective Date Rule 2002 Service List for 18<sup>th</sup> Omn. Cl. Obj.  
149640.1

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In re BRAC Group, Inc.; Case No. 02-12152 (CGC)  
Post-Effective Date Rule 2002 Service List for 18<sup>th</sup> Omn. Cl. Obj.  
149640.1

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